REMARKS

This is in response to the Office Action of January 9, 2004, (Paper No. 8). By this Amendment, claims 4 and 6-13 are amended. Thus, claims 2-13 remain in the application with claim 13 being the only independent claim.

Preliminary, Applicant would like to acknowledge the telephone discussions between attorneys of the undersigned firm and Examiner Nguyen regarding the scheduling of an interview. It may be recalled that after receiving the first Official Action, an interview was requested. However, the Examiner suggested that a formal claim amendment be filed first and, if the amendment did not place the application in condition for allowance, an interview would then be scheduled. An Amendment was then filed, the Examiner withdrew the rejection, and has now issued this second Official Action with a new ground of rejection. After receiving the latest Official Action, an interview was again requested, but, apparently, the file could not be obtained from central storage sufficiently in advance of the deadline for a response. Accordingly, rather than go into an extension period, the present Amendment is filed and, if allowable subject matter cannot be identified, it is agreed the Examiner will telephone the undersigned attorneys to conduct the interview.

Turning to the latest Official Action, claims 3-10, 12, and 13 stand rejected as unpatentable over the Edmond et al. reference "R-OK: A Reflective Model for Distributed Object Management". Claims 2 and 11 are rejected as obvious over Edmond et al. further in view of the Rubin patent. Reconsideration is respectfully requested.

The present invention relates to the field of telecommunication services and, in particular, a telecommunication controller that controls telecommunication services. In this environment, the speed performance of the controller is essential because of the real time nature of the services which are implemented.

In the present invention as claimed, there are three major layers. The first layer is the control logic domain objects which are represented by the second layer, the meta objects. The meta objects interface with the third layer, the telecommunication services and isolate the domain objects.

The purpose of the controller is to control the telecommunication services. The invention achieves this while also decoupling the control logic from the telecommunication services. Thus, the logic can be modified without changing the services, and vice versa. This is an extremely important advantage in view of the frequent modifications required in both control and in telecommunication resources.

The primary reference of Edmond et al. is undated, although a handwritten year date (unintelligible) is written on the first page. In any event, Edmond et al. does not describe control of telecommunication services, or any other services for that matter. This paper describes: "four special reflective objects that are used to describe and monitor every object in the system". These four objects are gateway meta objects providing access to the meta level, and each of them represents a different act of reflection (3rd page, right col.). Edmond et al. then goes on to describe how these objects may be used in an educational database to store data concerning students. For example, a "Lookup" function maps a name to an object, so that each student attribute is paired with an object which handles requests to retrieve or update an associated attribute (4th page, right col.). Referring to the section 3.6 on the fifth page, right column, we see that the meta objects are for making or materialising an object, in this example, an object for a student named Jim. As is abundantly clear from section 4 at the bottom of the right hand column of the fifth page, the whole thrust of this document is explaining something, with reflection back from the meta level to the domain level. The summary on page 5 simply summarizes the above content, and should be interpreted in the light of the preceding article.

Thus, not only is there no anticipation of the features of the independent claim 13, but there is no teaching towards using any of the information. The skilled person addressing the problem of real time telecommunication services control would not have been motivated to consider art in the field of self-explanation in databases. Even if he or she were so motivated, there is nothing in Edmond et al. to teach how telecommunication services might be controlled. Indeed, Edmond et al. teaches use of four gateway meta

objects and further meta objects to expand on explanation of the domain object. The person of ordinary skill in the art would have considered such a complex meta architecture to be suitable for non-real time explanation uses, such as the educational use described, but not for telecommunication control.

Significantly, Edmond et al. does not teach isolation of the domain objects. Claim 13 expressly recites that the meta objects isolate the domain objects from the telecommunication services.

Claims 2 and 11 were further rejected as obvious over Edmond et al. in view of the Rubin patent. However, even if such a combination could be made, the Rubin patent does not supply the deficiencies discussed above and, thus, claims 2 and 11 are similarly in condition for allowance.

Thus, this application is now in condition for allowance. Should the Examiner have any questions after reviewing this Amendment, the Examiner is cordially invited to telephone the undersigned attorneys so that an early Notice of Allowance can be received. In the absence thereof, an interview is requested.

Respectfully submitted,

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